

Scott M. Riemer (SR 5005)
RIEMER & ASSOCIATES LLC
60 East 42nd Street, Suite 1750
New York, New York 10165
(212) 297-0700
sriemer@riemerlawfirm.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HOWARD EPSTEIN,

Plaintiff,

09 CV 5608 (WHP)(MHD)

-against-

ECF Case

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,

Defendant.

-----X

**UNOPPOSED MOTION TO SEAL DISCOVERY DOCUMENTS SUBJECT
TO THE PROTECTIVE ORDER REGARDING
CONFIDENTIALITY OF DISCOVERY MATERIAL**

Plaintiff, Howard Epstein (“Epstein”), by counsel, hereby moves this Court to seal the following documents in order to prevent public disclosure of personal data identifiers and other confidential information: (1) documents produced to plaintiff pursuant to the Stipulated Protective Order Regarding Confidentiality of Discovery Material, entered June 8, 2010, in the instant action, which are being filed as **Exhibits 1 through 9** of the Affirmation of Scott M. Riemer, dated June 13, 2012 (“Riemer Affirmation”) filed in support of plaintiff’s motion for summary judgment; and (2) documents produced pursuant to the Stipulated Protective Order Regarding Confidentiality of Discovery Material, entered December 30, 2010, in *Ahmad v. Hartford Life and Acc. Ins. Co.*, U.S. Dist. Ct. S.D.N.Y., Civ. Act. No. 10-cv-4545(PAC)(MHD), which are being filed as **Exhibits 10 through 14** of the Riemer Affirmation. Counsel for Defendant does not oppose this motion.

WHEREFORE, Plaintiff requests that the Court enter an order allowing **Exhibits 1 through 14** of plaintiff's motion for summary judgment to be filed under seal.

Dated: New York, New York
June 13, 2012

RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
60 East 42nd Street, Suite 1750
New York, New York 10165
(212) 297-0700

By: /s/Scott M. Riemer
Scott M. Riemer (SR5005)

TO:

Michael H. Bernstein, Esq.
Sedgwick LLP
125 Broad Street
39th Floor
New York, NY 10004-2400
212-898-4011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2012, I served a true and complete copy of the foregoing Notice of Motion by transmitting the same by electronic mail to the following individuals at the e-mail addresses indicated:

Michael H. Bernstein, Esq.
Sedgwick LLP
125 Broad Street, 39th Floor
New York, New York 10004-2400
Tel.: (212) 422-0202
Fax: (212) 422-0925
Attorneys for Defendants

I also certify that this document filed through the ECF system will be sent electronically to all registered participants on June 13, 2012.

Dated: New York, New York
June 13, 2012

/s/Scott M. Riemer
Scott M. Riemer (SR5005)